

EXHIBIT 22

Page 1

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

IN RE: JOHNSON & JOHNSON TALCUM

POWDER PRODUCTS MARKETING, SALES

PRACTICES, AND PRODUCTS

LIABILITY LITIGATION

MDL NO: 16-2738(FLW)(LHG)

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THIS DOCUMENT RELATES TO

ALL CASES

_____/

PAGE 1 TO 343

The Videotaped Deposition of GHASSAN SAED, PH.D.,
Taken at 1 Park Avenue,
Detroit, Michigan,
Commencing at 9:15 a.m.,
Wednesday, January 23, 2019,
Before Laurel A. Frogner, RMR, CRR, CSR-2495.

1 specific.

2 Q. Are your opinions in this case premised on talc
3 containing asbestos?

4 A. (Witness shakes head from side to side.) I don't know,
5 no, my opinion has nothing to do with that.

6 Q. Are your opinions in any way based on talc having heavy
7 metals in them?

8 A. No.

9 Q. Is it your opinion that talc without asbestos or
10 without any other constituents can cause ovarian
11 cancer?

12 A. The one that I got in this bottle from J & J, yes.

13 Q. Is it your opinion, Doctor, that your studies or your
14 experiments show that talc increases cellular
15 proliferation and decreases apoptosis?

16 A. I'm sorry, one more time, one more time.

17 Q. Sure. Is it your opinions or is it your opinion that
18 talc use increases cellular proliferation and decreases
19 apoptosis in normal ovarian cells?

20 A. My finding clearly indicates that if you treat cells
21 with talcum powder, the results of this treatment is a
22 dose response increase in proliferation and decrease in
23 apoptosis, yes.

24 Q. In normal ovarian cells?

25 A. In normal and in cancer cells.